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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON MEDFORD DIVISION

CONCERNED FRIENDS OF THE WINEMA, KLAMATH-SISKIYOU WILDLANDS CENTER, WESTERN WATERSHEDS PROJECT, OREGON WILD, and CENTER FOR BIOLOGICAL DIVERSITY,

Plaintiffs,

V.

U.S. FOREST SERVICE, and U.S. FISH AND WILDLIFE SERVICE,

Defendants,

and

IVERSON MANAGEMENT LIMITED PARTNERSHIP,

Defendant-Intervenor.

Case No. 1:14-cv-737-CL

PLAINTIFFS' UNOPPOSED MOTION TO STAY MOTION FOR ATTORNEYS' FEES AND COSTS Plaintiffs Concerned Friends of the Winema, Klamath Siskiyou Wildlands Center,

Western Watersheds Project, Oregon Wild, and Center for Biological Diversity respectfully

move this Court to stay their concurrently-filed Motion for Attorneys' Fees and Costs until

January 19, 2018 in order to explore settlement with Defendants, and if such negotiations fail, to

permit the parties to file additional materials, including memoranda, declarations and exhibits,

regarding the fee application at a later time. Defendants do not oppose this motion.

Plaintiffs and Defendants recently initiated settlement negotiations regarding Plaintiffs'

claim for fees and costs. The parties are hopeful that these negotiations will be successful. The

Equal Access to Justice Act, however, requires Plaintiffs to file an application for fees and costs

within 30 days of a final judgment. Accordingly, Plaintiffs have filed concurrently with this

motion an application for an award of attorneys' fees and costs on this matter. If the parties

cannot reach agreement on fees, Plaintiffs will file their supporting materials on or before

January 19, 2018.

Accordingly, Plaintiffs respectfully request that the Court approve this motion.

Dated: October 19, 2017

Respectfully submitted,

s/Lauren M. Rule

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